

NOTICE

Security and Safeguards Division

June 20, 2005

Notice No. 0155

Accountable Classified Removable Electronic Media

Summary: This Notice consolidates current requirements for accountable classified removable electronic media (ACREM) and rescinds outdated, inaccurate, or non-applicable policies.

1.0 Introduction

1.1 BACKGROUND

The current regulatory and audit environment pertaining to the protection, control and use of accountable classified removable electronic media (ACREM) throughout the NNSA/DOE complex has made it extremely difficult to disseminate current ACREM policies and procedures in a timely fashion. As an interim approach, to ensure that Laboratory workers have a source of correct and current requirements information in this critical policy area, this Notice is being issued.

At the same time, a comprehensive ACREM policy document is under development, and will be issued at a future date in accordance with standard Laboratory policy development criteria.

1.2 AUTHORITY AND APPLICABILITY

This Notice applies to all workers. It covers only ACREM owned by LANL. This Notice does not apply to CREM that is designated special access program (SAP) material or COMSEC material. Such materials follow their own programmatic accountability requirements.

This Notice is effective immediately upon issue.

1.3 PURPOSE

This Notice consolidates and augments existing requirements for identifying and creating, ACREM and for managing it through accountability systems. It is intended to be used in conjunction with the most current version of [Classified Media Library Procedures](#).

1.4 ACRONYMS AND INITIALISMS

ACREM—accountable classified removable electronic media

AIS—automated information system

CLC—classified library custodian

CML—classified media library

CMPC—classified matter protection and control

COMSEC—communications security

CREM—classified removable electronic media

DAA—designated accrediting authority

DOE—Department of Energy

LANL—Los Alamos National Laboratory

LIR—Laboratory Implementation Requirement

NNSA—National Nuclear Security Administration

SAP—special access program

SIB—Security Integration Board

SIT— Security Inquiry Team

SRLM—security responsible line manager

UCOP—University of California Office of the President

1.5

DEFINITIONS

accountable classified removable electronic media (ACREM)—Items that meet the criteria for classified removable electronic media and are also considered accountable under the criteria in the this document.

automated information system (AIS)—a) An assembly of computer hardware, software, or firmware configured to collect, create, communicate, compute, disseminate, process, store, or control data or information; b) an assembly of computer hardware, software and firmware configured for the purpose of automating the functions of calculating, computing, sequencing, storing, retrieving, displaying, communication, or otherwise manipulating data, information, and textural material.

classified matter custodian (CMC)—A person authorized by his or her organization's security responsible line manager (SRLM) and trained by S-2, Security Integration, to be a custodian for classified matter. **Note:** *Custodians of classified media other than ACREM, documents, parts, and materials are classified matter custodians.*

classified library custodian (CLC)—A worker who is authorized to manage the ACREM holdings of a classified media library.

classified media library (CML)—A holding of ACREM stored within a vault, vault-type room, or locked room approved by the Security Integration Board.

classified removable electronic media (CREM)—Classified electronic media are those materials and components manufactured to provide nonvolatile storage of classified digital data that can be read by a automated information system. "Removable" refers to such media that are

- designed to be introduced to and removed from an automated information system without adverse impact on system functions, or
- separated from the system for any reason, or
- portable electronic devices.

mass move—Physical relocation of the entire inventory of ACREM managed by a CLC.

mass storage systems—Centralized systems that back up and archive electronic data and that by virtue of their design and operation preclude the removal of media without detection.

security area—A physical space designated for DOE safeguards and security interests (that is, classified matter and/or nuclear materials) that require physical protection measures. At a minimum, such protection would entail controlling access to and from the designated area. Security Areas at the Laboratory comprise Limited Areas (LAs), Exclusions Areas (EAs), Protected Areas (PAs), Material Access Areas (MAAs), and Sensitive Compartmented Information Facilities (SCIFs). **NOTE:** *This definition differs from the DOE definition of security areas, which includes LAs, EAs, PAs, MAAs, Property Protection Areas (PPAs), Vital Areas, and functionally specialized security facilities and secure communications centers.*

worker—A worker is any person who performs work at the Laboratory (whether on the Laboratory's DOE-owned, leased, or rental property). Workers include UC employees, subcontractors, vendors, external organization employees, affiliates, and official visitors.

1.6

RECISSIONS

1.6.1

The following documents are wholly or partially rescinded:

- Notice 0136, *Requirements for Accountable Classified Electronic Media*, March 1, 2004, is cancelled;
- *UCOP Policy on Accountable Classified Removable Electronic Media*, March 2, 2004, has been rescinded by the University of California and is no longer applicable;
- Notice 0104, *Destruction of Classified Matter*, October 11, 2002, does not apply to ACREM;
- Notice 0099, *Inventory of Accountable Classified Matter*, September 16, 2002, is cancelled;
- Classified Security LIR, 406-00-02, Attachment 5, *Destruction of Classified Matter*, does not apply to ACREM;
- Classified Security LIR, 406-00-02, Attachment 6, *Accountable Classified Matter*, does not apply to ACREM except for Section 3.4, Table 1, Logging Requirements For Accountable Classified Matter.

- 1.6.2 This Notice and the most current version of the [Classified Media Library Procedures](#) shall take precedence over any other official LANL documentation, current or superseded, where there is, or appears to be, a conflict in regards to ACREM requirements.

NOTE: *Laboratory workers are advised to contact the Security Help Desk (665-2002 or security@lanl.gov) for assistance in ascertaining the most current requirements and procedures.*

2.0 General Requirements

2.1 TRAINING

- 2.1.1 S-2 will provide training on the handling of ACREM.
- 2.1.2 S-9 will manage the authorization process for classified library custodians (CLCs).
- 2.1.3 Before being authorized to perform the functions assigned to a CLC, the CLC must
- 1) complete training plan #6892, *Classified Library Custodians*, and
 - 2) receive an appointment in writing from the S-9 group leader.
- 2.1.4 All workers must complete training plan #6943, *ACREM Borrower/SRLM* before they are authorized to borrow ACREM items.
- 2.1.5 Line managers responsible for borrowers must complete training plan #6943, *ACREM Borrower/SRLM*.

2.2 REMOVABLE ELECTRONIC MEDIA

- 2.2.1 "Removable" refers to such media that are
- designed to be introduced into and removed from an AIS without adverse impact on AIS functions, or
 - separated from the AIS for any reason, or
 - portable electronic devices.
- 2.2.2 A current list of removable electronic media can be found at <http://int.lanl.gov/security/protectinfo/crem/ID-ACREM.shtml>
- ### 2.3 ACCOUNTABLE CREM
- 2.3.1 Removable electronic media containing the following data must be entered into accountability:
- Top Secret (TS);
 - Secret Restricted Data (SRD);
 - Sigma 14 and 15;
 - Secret CREM stored outside a Security Area;
 - Deployable Nuclear Emergency Search Team (NEST) and Accident Response Group (ARG) operations;
 - Secret or Confidential NATO ATOMAL;
 - Designated United Kingdom information.
- 2.3.2 Removable electronic media becomes accountable if inserted into the READ/WRITE drive of any AIS accredited at a classification listed in 2.3.1. This includes READ only software media and blank media.
- 2.3.3 CREM is exempted from accountability provided if
- is protected by multiple layers of physical security , and
 - employs an AIS design that precludes undetected removal of the media.
- 2.3.4 Organizations that utilize electronic disk farms, multimedia backup units, or similar electronic mass storage devices with system software and/or system device registries capable of verifying the presence of their classified media must use this capability as a tracking system for these media if they are exempted from accountability under 2.3.3.
- 2.3.5 The exemption of CREM from accountability under the criteria in 2.3.3 and 2.3.4 must be approved by the Security Integration Board (SIB).
- 2.3.6 CREM exempted from inclusion in an accountability system in 2.3.3 must be entered into an accountability system once separated from the parent AIS or mass storage system.
- CREM items removed **for maintenance or repair purposes** only from a classified AIS or mass storage system that has been exempted from accountability per the requirements in 2.3.3 - 2.3.5 are themselves exempt from

accountability if the requirements in the system maintenance procedures are (see <http://int.lanl.gov/security/protectinfo/crem/docs/AIS-Requirements.pdf>)

- 2.3.7 There is no requirement to enter into the LANL accountability system CREM that is owned by another laboratory or agency and is brought to LANL for temporary use and/or storage by an employee of another laboratory or agency.
- 2.4 ACCOUNTABILITY SYSTEM REQUIREMENTS
- 2.4.1 Procedures must be developed, documented, and communicated to ensure that all ACREM not exempt from formal accountability are entered into an accountability system.
- 2.4.2 Each piece of ACREM must be assigned a unique identifier.
- 2.4.2.1 Any unique identifier, such as a vendor-provided serial number, associated with a piece of media may be used to meet this requirement.
- 2.5 CREATING ACREM
- 2.5.1 All ACREM must be brought into accountability.
- 2.5.2 Creators of ACREM must ensure that ACREM is marked and brought to a CLC for entry into the accountability system
- the day it was created, or
 - if it was created after normal CML operating hours, by close of business the following business day.
- 2.6 MARKING
- 2.6.1 ACREM must be marked with the accreditation level of the AIS unless
- an appropriate classification review has been conducted or the information has been generated by a tested program verified to produce consistent results and approved by the Designated Accrediting Authority (DAA), or
 - the required marking is impractical or interferes with operation of the media. Alternate marking procedures must be documented in an approved security plan.
- 2.6.2 All classified media must be marked according to LANL marking requirements (see <http://int.lanl.gov/security/protectinfo/crem/marketing.shtml>)
- 2.7 OWNERSHIP
- 2.7.1 ACREM items are owned by the CML to which they are assigned.
- 2.7.2 ACREM items are not owned by individual CLCs.
- 2.8 TRANSFERS
- 2.8.1 Change of Ownership (Transfer)
- 2.8.1.1 All transfers of ACREM must be processed through a CLC.
- 2.8.1.2 All transfers of ownership of ACREM must be made by a receipt.
- 2.8.1.3 The sending and receiving CLCs must both maintain a copy of the receipt for transfer of ACREM.
- 2.8.1.4 For on-site transfers a signed copy of the receipt must be returned to the sending CLC within 4 working days of receiving the ACREM.
- 2.8.1.5 For off-site transfers a signed copy of the receipt must be returned to the sender within 30 working days of receiving the ACREM.
- 2.8.2 Any worker who receives ACREM must ensure that the ACREM item is marked and brought to a CLC for entry into the accountability system
- the day it was received, or
 - if it was received after normal CML operating hours, by close of business the following business day.

- 2.9 STORAGE
- 2.9.1 Storage requirements for ACREM are contained in the [Classified Media Library Procedures](#).
- 2.9.2 For mass moves an S-9, Deployed Services, approved security plan is required and must specify
- how ACREM will be accounted for before, during, and after the move, and
 - the timeframe within which these functions must be accomplished.
- 2.10 DESTRUCTION
- 2.10.1 ACREM items must not be destroyed locally.
- 2.10.2 Destruction requirements for ACREM are contained in the [Classified Media Library Procedures](#) and in the [Classified Staging and Storage Center Procedures](#).
- 2.11 INVENTORIES
- 2.11.1 Inventory requirements for ACREM are contained in the [Classified Media Library Procedures](#).
- 2.11.2 Personnel overseeing CMPC requirements must be provided access to any area in which ACREM is stored.
- 2.12 MISSING ACREM
- 2.12.1 If an ACREM item cannot be located by the CLC or borrower, it is considered missing and must be reported immediately to the S-2 Security Inquiry Team (SIT), 665-3505.

3.0 Resources

3.1 REFERENCES

DOE M 471.2-1C, *Classified Matter Protection and Control Manual*, 07/14/2004.

<http://www.directives.doe.gov/pdfs/doe/doetext/restrict/neword/471/m4712-1cc1.pdf>

LANL *Classified Media Library Procedures*

<http://int.lanl.gov/security/protectinfo/crem/docs/CML-procedures.pdf>

LANL *Classified Staging and Storage Procedures* <http://int.lanl.gov/security/protectinfo/crem/docs/CSSC-procedures.pdf>

3.2 CONTACTS

Responsible Office: Information Security, S-11, Darryl Overbay, 665-7494

Responsible Manager: John E. Killeen, S-DL, 667-5911



This Notice will remain in effect for one year or until these requirements are incorporated into an approved LANL requirements document.

Issued by the Responsible Manager: John E. Killeen	Signature: Signature on File	Date: 06/20/05
Endorsed by: W. Scott Gibbs ADSFO, Chief Security Officer	Signature: Signature on File	Date: 06/20/05
Reviewed by Policy Office M. Diana Webb	Signature: Signature on File	Date: 06/21/05